

# Exhibit 24

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NATASHA SEVERIN and GALINA  
COTOVA, individually and on Behalf of  
all others similarly situated,

No. 10 Civ. 9696(DLC)

Plaintiffs,

- against -

**DECLARATION**

PROJECT OHR, INC., METROPOLITAN  
COUNCIL ON JEWISH POVERTY, and  
D'VORAH KOHN,

Defendants.  
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I, Ekatarina Derjavina, pursuant to 28 U.S.C. §1746, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am employed by Project OHR, Inc. (Project OHR) as a home attendant and the declarations I make below are true and correct to the best of my knowledge, information and belief.

2. I have worked as a Home Attendant at Project OHR for 10 years. I have worked various shifts over those years, including hourly shifts, split-shifts, and sleep-in shifts. In the past two years I have mostly cared for two clients. I now regularly work an hourly shift usually lasting 12 hours for one of those clients, and I work the daytime end of a split-shift for another client – that shift also lasts 12 hours. Together, I typically work around 48 hours per week caring for those two clients. Sometimes I may work additional hours if I am asked to fill in for another home attendant.

3. My job is to care for my clients. Each client has different personal needs. Depending on the day and the time of my shift, I care for them in different ways. I may do any number of things like prepare their food and help them eat, dress them, bathe them and assist them with personal hygiene, and do their laundry. I may help them take their medicine, take them to get exercise outside or just sit in the park. I may take them to the doctor's office or help them grocery shop. I may also have to rotate them when they are lying down for long periods of time. I also just spend time talking to them and keeping them company.

4. I also help clean up after my clients because I must help keep them healthy and safe. If I prepare food and feed my clients, I have to wash the dishes and sweep the surrounding area afterwards. If I bathe my clients, I have to wipe up the bathroom floor and clean the bathtub. If my client soils their clothes or the bed, I have to change and wash those clothes or sheets. If the client has an accident on the floor such as spilling their food or drink or even soiling the floor, I have to wash the floor. These activities, including cleaning up after my client and keeping their homes safe, take up nearly all of the time on my shift.

5. We also perform other light cleaning to ensure that the client lives in a clean and safe home. It means that occasionally I will do things like dust certain parts of my client's bedroom or common room, sweep or vacuum the bedroom, common area and bathroom floor. I do this about once a week. Every once in a while, when needed, I will clean the client's refrigerator. I do this as often as the client's plan of care says I should do this – usually this is no more than once a week. Although it varies from client to client, it usually takes me around an hour or less a week to perform this type of light

cleaning around the home. However, I will say that for my client who has asthma, I will dust and vacuum more than once a week to ensure their continued health. This might add an hour or two to my light cleaning duties in a week. How much light cleaning I do depends on the size of the client's apartment – although they are generally small, studios and one bedroom apartments, or sometimes they are larger if someone else lives there.

6. I do not do what they call heavy cleaning. Heavy cleaning, to me, means more than just occasional sweeping or vacuuming or dusting of a room. It means going behind or under furniture to sweep or vacuum, cleaning out old drawers and closets and throwing everything out, waxing or polishing floors or other things, cleaning windows and curtains and the like. These are the types of cleaning that is for housekeepers or the client's family members do it. It is not part of my job because my job is to care for my client. I, like every other home attendant, know that it is against the rules to do heavy cleaning, and has been against the rules for as long as I have worked here. Project OHR constantly reminds home attendants of this rule, including at our in-service training sessions that we attend twice a year. Our union reps also tell us this.

7. My clients know that I am not allowed to do heavy cleaning and they do not ask me to do any heavy cleaning. Their family members have never asked me to do heavy cleaning either. In the past, when I cared for other clients, some of them may have asked me to do heavy cleaning. I always told the client that I was not allowed to do heavy cleaning. If the client continued to ask for heavy cleaning, I called my personnel specialist. The personnel specialist always called the client to tell them that I was not permitted to do heavy cleaning, and the issue went away after that.

8. Although I can read, write and speak in English, Russian is my first language. Before I signed this declaration it was translated to me in Russian.

Dated: November 23 2011  
New York, New York

By:   
Ekatarina Derjavina

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